

EXHIBIT A



7777 BONHOMME AVE, #2100
ST LOUIS (CLAYTON) MO 63105

BEN SANSONE
(314) 863-0504
BEN@MISSOURILAWYERS.COM

June 16, 2022

VIA FACSIMILE/EMAIL: 908-688-6483

Bed Bath & Beyond
Attention: Claims Department
650 Liberty Ave.
Union, NJ 07083

Re:	Our client:	Carla Cox
	Date of injury:	05/12/2022
	Location:	Bed Bath & Beyond – 6611 N Illinois St., Fairview Heights, IL 62208

Dear Sir/Madam:

I have been retained to represent the above-named in their claim for damages arising from the above injuries. Please confirm receipt, via email preferred Ben@MissouriLawyers.com or Facsimile # (314) 677-3530.

My employment is by contingent contract under provision of R.S.Mo. §484.140 or 770 ILCS 5/1 and I hereby claim a lien with regard to any and all monies or other consideration recovered from you, or others on your behalf, as a result of settlement, lawsuit or other methods. My firm's payment information is "Sansone Law, LLC" tax id #, [REDACTED]

PRESERVATION OF EVIDENCE: We hereby serve this formal notice and demand that **all forms of evidence** including, but not limited to: **videos, surveillance, photographs, reports, maintenance logs, witness statements and electronic data** pertaining to and/or obtained during the above referenced clients' incident be preserved and retained until further written notice of the undersigned or upon order of a court of competent jurisdiction. Such evidence includes, but is not limited to, **ALL VIDEO EVIDENCE FOR THE ENTIRE DATE OF LOSS including any video depicting the Plaintiff while on your premises, the actual incident, and the area where the incident occurred, as well as any maintenance/inspection logs from the above referenced for the entire week before the date of loss and the date of loss itself.** The purpose of this notice and demand is to ensure all relevant evidence and/or electronic data is identified and not inadvertently altered, deleted, or otherwise modified. Thus, your failure to preserve and retain all pertinent evidence/electronic data may, under the circumstances, constitute spoliation of evidence. **Please note**

that we will pursue all avenues of recourse for failure to preserve this vital evidence including requesting adverse instructions and inferences for failure to maintain this evidence.

Thank you for your attention to this matter.

Regards,

A handwritten signature in black ink, appearing to read "Ben Sansone". The signature is fluid and cursive, with the first name "Ben" and last name "Sansone" clearly distinguishable.

Ben Sansone